

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar No. 7709

PATRICK A. ROSE
Assistant United States Attorney
Nevada Bar No. 5109
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
Patrick.Rose@usdoj.gov

Attorneys for the Federal Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Jeremia Gillo, an individual,

Plaintiff,

v.

The Honorable Pete Buttigieg, Secretary of
Transportation,

Defendant.

Case No: 2:22-cv-00857-CDS-NJK

**Unopposed Motion for Extension of
Time**

(First Request)

The Federal Defendant respectfully moves for a 30-day extension of time, from October 24, 2022 to November 23, 2022, to file a response to Plaintiff's Complaint (ECF No. 9). This is the first request for an extension of time.

MEMORANDUM OF POINTS AND AUTHORITIES

Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to request additional time to perform an act. In this case, the Federal Defendant requests additional time to file a response to the Complaint for the reasons set forth below.

Defense counsel has not yet received any file materials or information from the client agency, the Federal Aviation Administration. This extension of time is requested to allow undersigned counsel adequate time to review relevant materials and prepare a response to the Complaint in this matter. This motion is filed in good faith and not for the purposes of

1 undue delay. Undersigned defense counsel has consulted with Plaintiff's counsel, Ms.
2 Sulton, who advises that she does not object to the request for extension requested herein.

3 For the above reasons, the Federal Defendant respectfully requests this extension of
4 time, from October 24, 2022 to November 23, 2022, to file a response to Plaintiff's
5 Complaint.

6 Respectfully submitted this 24th day of October 2022.

7 JASON M. FRIERSON
8 United States Attorney

9 /s/ Patrick A. Rose
10 PATRICK A. ROSE
11 Assistant United States Attorney

12
13 **IT IS SO ORDERED**

14 
15 **UNITED STATES MAGISTRATE JUDGE**

16 **DATED:** October 25, 2022
17
18
19
20
21
22
23
24
25
26
27
28